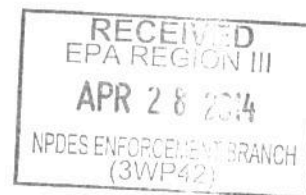




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April 25, 2014

Ms. Ingrid H. Hopkins  
Water Protection Division (3WP42)  
US EPA – Region III  
1650 Arch Street  
Philadelphia, PA 19103-3029  
(215) 814-5437  
[hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov)

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094  
Metal Excursions– Outfall 013Q**

Dear Ms. Hopkins,

This letter is a follow-up to the April 21, 2014 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting LLC., to report daily maximum Copper and Zinc excursions from a storm water grab sample taken on April 07, 2014 from Outfall 013.

On April 21, 2014 Ms. Brinkerhoff received the laboratory analysis indicating that the daily maximum concentrations for Copper and Zinc were exceeded. Ms. Brinkerhoff made the required telephone notification to the US Environmental Protection Agency (EPA) in accordance with NPDES permit condition VI.6.

The results of the laboratory analyses for Copper and Zinc are shown in the following table:

Analyte	Units	Permit Limit Daily Max	Results
Copper	ug/L	13.44	20
Zinc	ug/L	117.18	130

Although the concentrations of copper and zinc measured during the April sampling event exceed the permit limits, they are substantially lower than the concentrations measured during the two prior sampling events (June 2013 and October 2013) and are approximately the same as the concentrations measured in January of 2013 shortly after Pepco completed the implementation of Phase I (inlet maintenance) and Phase II (metal management) control measures under the TMDL Plan as required by the permit, and which were the lowest concentrations measured during the current permit term.

1300 North 17<sup>th</sup> Street • Suite 1500 • Arlington • VA • 22209 • 703-253-1800 • Fax 703-253-1799 • [www.pepcoenergy.com](http://www.pepcoenergy.com)

*Pepco Energy Services, Inc. is not the same company as Potomac Electric Power Company (Pepco), the regulated utility, and prices and services of Pepco Energy Services, Inc. are not set by the Public Service Commission.*

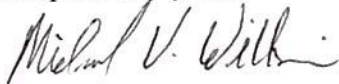
In addition, according to calculations by AMEC, our environmental consultant assisting with the implementation of the TMDL Plan, the April 2014 sampling results continue to show a significant decrease in metal concentrations in storm water discharges from Outfall 013 compared to baseline concentrations. Specifically the following percent reductions were obtained: Cadmium – 100%, Copper – 69%, Iron – 85%, Nickel – 91%, Lead – 9%, and Zinc – 86%.

We have not identified any specific reason for the April 7, 2014 permit excursions. However, as a follow-up to these recent excursions, we will be implementing additional preventative measures as follows:

1. Weekly inspection of storm drain inlets throughout the facility,
2. Daily road sweeping around the power plant demolition activities and,
3. Placing fabric filter on storm drain inlets within the demolition footprint, topped with stone and surrounded by metal absorbing socks, in accordance with the storm inlet portion of the approved Soil, Sediment and Erosion Control Measures, prepared by AMT Engineering consultants.

Please contact me at (703) 253-1787 or by electronic mail at [mwilliams@pepcoenergy.com](mailto:mwilliams@pepcoenergy.com) if you need additional information.

Respectfully yours,



**Michael V. Williams**  
**Power Plant Asset Manager**  
**Pepco Energy Services, Inc.**